

EXHIBIT 70

SECOND MAO DECLARATION PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

MATERIAL SOUGHT TO BE SEALED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, JULIEANNA)
MUNIZ, ELIZA CAMBAY, SAL) Case No.:
CATALDO, EMIR GOENAGA, JULIAN) 3:20-cv-04688
SANTIAGO, HAROLD NYANJOM, KELLIE)
NYANJOM, and SUSAN LYNN HARVEY,)
individually and on behalf of all)
others similarly situated,)
Plaintiffs,)
vs.)
GOOGLE LLC,)
Defendant.)

-----)

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF STEVE GANEM
FRIDAY, OCTOBER 28, 2022

REPORTED BY NANCY J. MARTIN
CSR. NO. 9504, RMR, RPR
CLAUDIA R. GARCIA, CSR. 12812
JOB No. 5554575

PAGES 1-325

1 BY MR. MAO:

2 Q Are those proto buffers, by the way, or are
3 those protocols, or is that like somehow different than
4 proto buffers?

5 A They are related. But I'm not sure if they 06:34:42
6 are the same.

7 Q Okay. I presume that you can't enumerate the
8 [REDACTED] off the top of your head; right?

9 A I can't. Though I think earlier we
10 identified, I believe, [REDACTED] And we hadn't 06:35:02
11 discussed Google Analytics for the web, which I believe
12 has other logs.

13 Q Sorry. Which document did we identify six?

14 A You may recall that earlier, when we went back
15 on the record, we came back to you with more details 06:35:26
16 regarding the logs after speaking to engineers.

17 Q I oh, see. That's what you're referring to.
18 Sorry. I was confused. I thought maybe we were
19 referring to a document that we had just looked at.

20 So can you confirm what those [REDACTED] are in terms 06:35:42
21 of the ones that are for -- the ones that are listed
22 there? And I appreciate you telling me which three
23 protocols you're talking about, though.

24 MR. SANTACANA: So it sounds like outside
25 scope as to the other [REDACTED], is what he's saying. 06:35:59

Page 223

1 MR. MAO: Well, he said he thinks. So I want
2 to make sure.

3 BY MR. MAO:

4 Q I mean, you have a very easy way to verify
5 that. It looks to me like the log sources, the 06:36:15

6 [REDACTED]

7 MR. SANTACANA: Where? Oh, log, sources,
8 details -- okay. We can try.

9 MR. MAO: I appreciate that.

10 MR. SANTACANA: Thanks for pointing that out. 06:36:32

11 MR. MAO: Yeah. I kind of make life easier
12 for everyone.

13 BY MR. MAO:

14 Q Um, if you don't mind going -- turning back a
15 little bit with me to 440, and you're going to have to 06:36:43

16 really expand this here. That will be page 8 of the
17 PDF. I have to magnify that a little bit.

18 My first question actually is, what are
19 bundles, the bundles referred there? I guess, like,
20 I'm trying to understand, are they more like -- like 06:37:14
21 event rows, or is it more than that?

22 A Earlier when describing the data flow from a
23 user interaction to the registering of an event to the
24 later transmission of an event, all done in a way that
25 tries to minimize the use of the end user's device 06:37:47

Page 224

1 resources and bandwidth.

2 Part of what we do to reduce that usage of
3 bandwidth and battery is to bundle together events
4 which occurred within a short time span of each other
5 into a single file that is transmitted to Google. 06:38:07
6 Bundle here refers to that grouping together of events
7 which were registered within a certain time span.

8 Q And those -- those bundles there appear to me
9 to -- all three bundles, if you look at the last row,
10 all seem to include [REDACTED] as in those 06:38:35
11 could actually be -- end up in the same bundle
12 together; is that correct?

13 A [REDACTED] would never be in the same
14 bundle as each other.

15 Q Could either -- or sorry. 06:38:58

16 Can they though however be in the same bundle
17 as the [REDACTED]

18 A [REDACTED] would never be in the same
19 bundle as each other. It's possible that [REDACTED]
20 could be in the same bundle together. 06:39:21

21 Q Got it. And that's because on iOS, there is
22 no [REDACTED]?

23 A That's correct.

24 Q Are any of these [REDACTED] ever
25 present in Google Takeout data? 06:39:41

Page 225